

STEPTOE & JOHNSON LLP

ATTORNEYS AT LAW

1330 CONNECTICUT AVENUE, N.W.
WASHINGTON, D.C. 20006-1798PHOENIX, ARIZONA
TWO RENAISSANCE SQUARETELEPHONE: (602) 257-8800
FACSIMILE: (602) 257-5299

(202) 428-8000

FACSIMILE: (202) 428-3902
TELEX: 88-2603STEPTOE & JOHNSON INTERNATIONAL
AFFILIATE IN MOSCOW, RUSSIATELEPHONE: (011-7-801) 258-5250
FACSIMILE: (011-7-801) 258-5251SARA BETH WATSON
(202) 428-6460**CONFIDENTIAL
FOR SETTLEMENT PURPOSES ONLY**

July 15, 1996

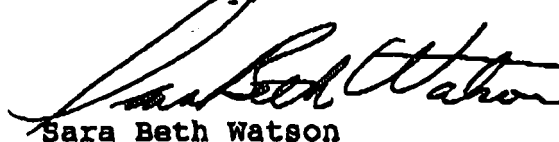
VIA TELECOPYDamaris Cristiano, Esq.
Assistant Regional Counsel
Office of Regional Counsel
U.S. EPA - Region II
290 Broadway
New York, New York 10007-1866Re: SCP/Carlstadt De Minimis Settlement
-- Pacquet Oneida

Dear Ms. Cristiano:

I am writing to follow-up our discussions regarding Pacquet Oneida. Attached is a certification explaining the relationship between Oneida Packaging Products, which is included on EPA's waste-in list, and Pacquet Oneida.

If you have any questions, please contact me at 202-420-6460.

Yours truly,


Sara Beth Watsoncc: Elizabeth Yu, Esq.
Department of Justice

598875



CERTIFICATION OF PETER L. ADAMS

I, PETER L. ADAMS, of full age, hereby certifies as follows:

1. I am Executive Vice President and majority shareholder of Pacquet Oneida, Inc. ("Pacquet Oneida"), a respondent at the Scientific Chemical Processing site located at 216 Paterson Plank Road, Carlstadt, New Jersey (the "SCP Site"). I make this Certification in connection with an administrative action, In the Matter of SCP Carlstadt Proceeding Under § 122(g)(4) of CERCLA, brought by the United States Environmental Protection Agency (the "USEPA"). The USEPA has requested a statement concerning the successor-in-interest to Oneida Packaging Products, Inc., a generator of materials allegedly disposed of at the SCP Site. I have full knowledge of the facts set forth herein.

2. "Pacquet Oneida, Inc." is a registered alternate name of "Butler & Smith, Inc." Butler & Smith, Inc. ("B&S") was incorporated in New Jersey in 1969. Its offices originally were located in Norwood, New Jersey; in 1980 the company moved to Kearny, New Jersey, and in 1981, B&S moved to its present location at 10 Clifton Boulevard, Clifton, New Jersey. B&S is a small family-owned company.


3. In 1980, B&S established a wholly-owned New Jersey subsidiary, Pacquet Corporation ("Pacquet"), to purchase the assets of the Pacquet Division of Standard Products Co., which was engaged in the business of manufacturing and selling flexible packaging materials for food and other products at 590 Belleville Turnpike, Kearny, New Jersey. In mid-1981, B&S incorporated another New

Jersey subsidiary, Butler & Smith Holdings, Inc. ("Holdings"), which purchased all of the outstanding stock of Oneida Packaging Products, Inc. ("Oneida") from Reed Deeron Corp. Oneida was conducting a business identical to Pacquet at its main facility (and corporate offices) at 10 Clifton Boulevard, Clifton, New Jersey and at a satellite plant in Carson, California. On December 31, 1981, Oneida, Pacquet and Holdings were combined to form Pacquet Oneida, and manufacturing operations were consolidated at the Clifton facility, where they continue today with approximately 150 employees. (A small plant with approximately 50 employees continues to operate in Carson, California.) As of December 31, 1990, B&S was merged into Pacquet Oneida and the corporate name was changed to "Butler & Smith, Inc.", trading as "Pacquet Oneida, Inc."

4. According to its corporate records, Oneida was incorporated in Delaware in July, 1962, and from inception had its "main office" at 10 Clifton Boulevard, Clifton, New Jersey.

5. Neither Oneida, Pacquet, Pacquet Oneida nor B&S are related to any other entities potentially liable as responsible parties at the Scientific Chemical Processing site.

I certify that the foregoing statements made by me are true. I am aware that if any of the statements made by me are willfully false, I am subject to punishment.


Peter L. Adams

DATED: July , 1996

**STEPTOE & JOHNSON LLP
ATTORNEYS AT LAW****PHOENIX, ARIZONA**
FACSIMILE: (602) 257-5289
VERIFICATION: (602) 257-52871330 CONNECTICUT AVENUE, N.W.
WASHINGTON, D.C. 20036-1785XEROX 7032 (202) 429-3902
XEROX 7032 (202) 429-3903
XEROX 7021 (202) 429-3904
TELEX NO 89-2503
VERIFICATION (202) 429-8152**MOSCOW, RUSSIA**
FACSIMILE: (011-7-501) 829-9701**(202) 429-3000**
FACSIMILE: (202) 429-3902
TELEX: 89-2503

IMPORTANT: This facsimile is intended only for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If the reader of this transmission is not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this transmission or its contents is strictly prohibited. If you have received this transmission in error, please notify us by telephoning and return the original transmission to us at the above address.

FROM**Name: Sara Beth Watson, Esq.**

Request Made On Date: July 15, 1996**Time: 12:29 PM**

Completion Required By Date: July 15, 1996**Time: asap**

DELIVER TO**Name: Damaris Cristiano, Esq.**

Organization or Firm: U.S. Environmental Protection Agency

Telecopy Phone Number: 212-637-3096**Verification Number: 212-637-3140**

Special Instructions:**Total Pages & Cover Sheet:****4****Date Transmitted:**

S&J Operator's Name:**Telephone Number:**

Client/Case Number: 73706.0001
